



## RURAL TELEPHONE SERVICE CO., INC.

*Your One-Stop Communications, Information and Entertainment Source*

May 8, 2012

Ms. Sharon Gillett  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: In the Matter of Connect America Fund, WC Docket No. 10-90; High-Cost Universal Service Support, WC Docket No. 05-337**

Dear Ms. Gillett:

Rural Telephone Service Co., Inc. (RTS) specifically seeks your assistance to evaluate and respond constructively to the FCC's recent changes to the quantile regression analysis (QRA).

We met with you and several other staff members of the Wireline Competition Bureau (WCB) on April 12, 2012 to discuss the negative impacts of the FCC's USF/ICC Order, FCC 11-161, on RTS and its subscribers. The results from the new QRA released in an Order from the WCB on April 25, 2012 appear to have an even larger negative impact on RTS and its subscribers. The proposed reduction in support would have grave consequences for RTS's customers, employees, and the communities served. Due to the serious impact of the Order, we request that the FCC assist us in evaluating how these results have been generated.

Appendix A of the April 25, 2012 Order lists the independent variables and general sources of data employed in the QRA. We request the following detailed information used to develop the per-line capital and operating expense limits for RTS's study areas, including, how the calculations were generated, supporting work papers and explanatory information:

- The study area boundaries map and study area square miles;
- Directions on the use of the Shapefile template data;
- The development of the number of road miles and road crossings;
- The census blocks included in the study area boundaries;
- The calculation of the construction values from the application of the soil database to the study area road data; and
- Any other data and development of the independent variables used for RTS's study area.

Due to the technical nature of the QRA, please respond directly to our cost consultant, Vincent Wiemer of Alexicon Consulting. Mr. Wiemer can be reached directly via e-mail at [vince@alexicon.net](mailto:vince@alexicon.net) or by telephone at (903) 440-2034.

Respectfully,

Rhonda S. Goddard  
COO Regulated Services

rsg/ckw

By e-mail

cc: Vincent Wiemer, Principal, Alexicon, Inc.